

Felmy

UNITED STATES DISTRICT COURT

for the
79 District of Texas

AUG 25 2014

David J. Bradley, Clerk of Court

United States of America)

V.)

Rosa Luna-Trejo)

Defendant(s))

Case No. B-14-MJ-781

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.
On or about the date(s) of 08/24/2014 in the county of Cameron in the 79 District of Texas, the defendant(s) violated:

Code Section

Title 21, United States Code, Section(s) 841 and 846.

Offense Description

knowingly and intentionally possess with intent to distribute approximately 3.1 kilograms of heroin, a Schedule I controlled substance, and did conspire with persons known and unknown to knowingly and intentionally possess with intent to distribute approximately 3.1 kilograms of heroin, a Schedule I controlled substance.

This criminal complaint is based on these facts:

On August 24, 2014, Rosa Elva LUNA-Trejo applied for entry in the U.S. from MX via the Veteran's International Bridge in Brownsville, Texas driving a 2004 Chevrolet Impala bearing MX plates [REDACTED]. At U.S. Customs and Border Protection (CBP) LUNA gave a negative declaration for illegal contraband. CBP officers then conducted a secondary inspection. The secondary inspection revealed an anomaly in the dashboard area of the vehicle. An intensive search revealed six (6) cylinder cans hidden in the dashboard area of the vehicle. CBP officers then opened the cans and extracted the contents which weight a total of 3.1 kilograms. The contents field tested positive for the characteristics of heroin, a Schedule I Controlled Substance.

LUNA was interviewed by Homeland Security Investigations Special Agents and admitted to knowing she was transporting narcotics secreted within her vehicle. LUNA further admitted that this was her third (3rd) trip transporting narcotics into the U.S. and that she was paid \$800 per trip.



Complainant's Signature

Edgar Figueroa Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Aug 25, 2014
Date

Brownsville, Texas

City and State



Judge's signature

Ronald Morgan U.S. Magistrate Judge

Printed name and title